SO. CAL. EQUAL ACCESS GROUP
Jason J. Kim (SBN 190246)
Jason Yoon (SBN 306137)
101 S. Western Ave., Second Floor
Los Angeles, CA 90004
Telephone: (213) 205-6560
cm@SoCalEAG.com

Attorneys for Plaintiff

Attorneys for Plaintiff ANA VENTURA

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## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

ANA VENTURA,

Plaintiff,

VS.

MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON UNISEX; ZAIDA CORINA CRUZ; and DOES 1 to 10,

Defendants.

Case No.: 2:24-cv-10520-SB (KSx)

Plaintiff's Notice of Motion and Motion for Default Judgment by Court

Date: March 14, 2025 Time: 8:30 a.m. Courtroom: 6C

Honorable Judge Stanley Blumenfeld Jr.

To Defendants MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON UNISEX; ZAIDA CORINA CRUZ; and the attorneys of record, if any: Please take notice that on March 14, 2025, at 8:30 a.m., or as soon thereafter as this matter may be heard by this Court located at 350 West First Street, Los Angeles, California, Plaintiff ANA VENTURA will present Plaintiff's motion for default judgment against Defendants MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON UNISEX and ZAIDA CORINA CRUZ. The Clerk has previously entered the default on said Defendants on January 21, 2025 (Dkt. #16) and January 29, 2025 (Dkt. #19), respectively.

At the time and place of hearing, Plaintiff will present proof of the following 1 matters: (1) Defendants MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON 2 UNISEX and ZAIDA CORINA CRUZ are not minors, incompetent persons, or in 3 military service or otherwise exempted under the Soldier and Sailor's Civil Relief Act of 4 1940; (2) Defendants MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON 5 UNISEX and ZAIDA CORINA CRUZ have not appeared in this action; and (3) Plaintiff 6 is entitled to judgment against said Defendant on account of the claims pleaded in the 7 complaint, to wit: a violation of the Americans with Disabilities Act. 8 The Plaintiff seeks a judgment in the amount of \$3,195.00 in attorney fees and 9 costs as set forth in the attached declaration of Jason J. Kim and an Order directing the 10 Defendants to: make alterations in such a manner that, to the maximum extent feasible, 11 the goods, services, facilities, privileges, advantages, or accommodations offered by 12 Defendants are readily accessible to and usable by individuals with disabilities at the 13 property located at or about 5568 Gage Ave., Bell Gardens, California. This motion is 14 based on this notice, the declarations submitted in support of this motion, and other 15 matters which may be presented at the hearing. 16 Notice of the original motion for default judgment by court was served on 17 18 19 prepaid. 20 21

Defendants MAYRA GUERRA D/B/A MAYRA'S BEAUTY SALON UNISEX and ZAIDA CORINA CRUZ on February 6, 2025 by first class United States Mail, postage

Dated: February 6, 2025 SO. CAL. EQUAL ACCESS GROUP

> By: /s/ Jason J. Kim Jason J. Kim, Esq. Attorneys for Plaintiff

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